

PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

Yes
 No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

Yes
 No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

Notes :

UNITED STATES DISTRICT COURT
EASTEN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

CHRISTOPHER FRANCIS DISPENSA,

Plaintiff,

v.

Case No. 25-12017
Hon. Matthew F. Leitman
Mag. Judge Kimberly G. Altman

JONATHAN DAVID GOOD,
a.k.a. "**JON MOXLEY**",
an individual, and **ALL ELITE WRESTLING**,
a Florida corporation;
jointly and severally,

Defendants.

RAITT LAW, PLLC

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DEFENDANT ALL ELITE WRESTLING'S CORRECTED NOTICE OF REMOVAL OF
ACTION

ALL ELITE WRESTLING, LLC (AEW), by and through its attorneys, **SEWARD HENDERSON PLLC**, and in support of their Corrected Notice of Removal of Action, states as follows:

1. AEW was served with a copy of the Complaint on June 10, 2025. A copy of the Complaint is attached hereto as Exhibit 1.
2. The rules for determining diversity for an LLC are different than for a corporation. LLCs have the citizenship of its members and sub-members, *Akno 1010 Mkt. St. St. Louis, Missouri LLC v Pourtaghi*, 43 F 4th 624, 627 (6th Cir. 2022). The citizenship of a trust is the citizenship of its trustees, *Navarro Savings Assoc. V. Lee* 446 U.S. 458 (1980).
3. AEW was formed in the state of Delaware and is wholly owned by Beatnik Investments, LLC. The members of Beatnik Investment, LLC are 2 trusts. The citizenship of the trustees are the state of Illinois.
4. That Defendant Jonathan David Good is a citizen of Cincinnati, Ohio. Please see paragraph 3 of the Complaint.
5. That this Court has original jurisdiction pursuant to 28 U.S.C. § 1332 and 28 U.S.C. § 1441, this action involves parties with a diversity of citizenship.
6. That the amount in controversy exceeds \$75,000, Defendant has received a letter claiming a lien in excess of \$215,000.

7. Jonathan Good has been served, and concurs in the removal of this matter.

WHEREFORE, the Defendant, **ALL ELITE WRESTLING, LLC**, requests that this action be removed from the Circuit Court for the County of Wayne to the United States District Court for the Eastern District of Michigan, Southern Division.

Respectfully submitted,

SEWARD HENDERSON PLLC

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Dated: July 7, 2025

CERTIFICATE OF SERVICE

I hereby certify that on **Monday, July 7, 2025**, I electronically filed the foregoing document with the Clerk of the court using the ECF system, which will send notification to the following: ***All Parties and Attorneys of Record***.

/s/ Niklas Thomas
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